From: Pavitt, John

To: <u>eziegenfuss@cityofeagle.org</u>; <u>kenny@wsmovers.com</u>

Cc: Fay, Laurie; Farnham, Kim; Cunningham, Roylene; Emanuel.Ziolkowski@deq.idaho.gov

Subject: RE: EPA asbestos notification form and lab testing for moving a building (historic church), Eagle, ID

Date: Friday, August 07, 2020 9:02:00 AM

Hello Eric and Kenny. Can you give me an update please on your project to move the church?

- Has the site been secured?
- Any loose debris from broken asbestos cement shingles been picked up?
- Are you planning on spraying soapy water or sealant on lower level exterior walls to prevent dust?
- What day are you planning on moving the building?

Please call me if you have any questions about submitting a notification to EPA as required by EPA's asbestos NESHAP regulations.

Sincerely,

John Pavitt, Air Compliance Inspector Air and Toxics Enforcement Section U.S. EPA Region 10 Alaska Operations Office Anchorage, AK

Phone: (907) 271-3688

From: Pavitt, John

Sent: Monday, August 03, 2020 2:57 PM

To: eziegenfuss@cityofeagle.org; kenny@wsmovers.com

Cc: Fay, Laurie <Fay.Laurie@epa.gov>; Farnham, Kim <Farnham.Kim@epa.gov>; Cunningham,

Roylene <cunningham.roylene@epa.gov>; Emanuel.Ziolkowski@deq.idaho.gov

Subject: EPA asbestos notification form and lab testing for moving a building (historic church), Eagle,

ID

Eric

City of Eagle, ID Public Works

Kenny

Western States Movers

Hello Eric and Kenny. I'm sending this email to follow up on my phone call with Eric today. Included with this email is a notification form which the owner or moving contractor needs to mail to EPA at the address below.

Public Complaint

I called in response to a pubic complaint from an Eagle resident, concerned that the project to move the historic church building at 125 E Mission Drive might release asbestos fibers. EPA regulates the moving of commercial, residential and institutional buildings under the "asbestos NESHAP" program (it is classified as a demolition under our regulations).

My understanding is that the church was moved to its current location some years ago and is going to be moved again in the days ahead. The intent is to preserve/protect the building and to do so without damaging it. Photos of the building sent to me today by the complainant appear to show it has cement shingles on the outside walls, which historically have been known to be manufactured with asbestos. Moving the building might disturb the shingles, and indeed several photos sent to EPA show cracks and some breakage at the lower level.

Notice and LAB Testing

- Please fill out and mail the attached 2-page form to EPA at the address below, including the dates that you plan on moving the structure.
- EPA also requires a survey for asbestos in advance of the move. Please bring at least 3 samples of the cement shingles to a lab for testing. In Boise, I know of 2 labs:
 L&R Group in Meridian, https://thelandrgroup.com/contact.html. #(208) 813-7700. Also, Material Testing offers asbestos lab testing in Boise. They can be reached at 208.376.4748.
 Other testing labs may be available and can be found by a web search.

Securing the Site

EPA classifies asbestos cement products as "Category II nonfriable" asbestos. When significantly damaged, they can release asbestos dust and become a regulated material. Please avoid damaging the shingles. To prevent the possible release of asbestos fibers from the building, I recommend that you pick up any loose pieces of cement shingles and place them in a plastic bag for disposal. If any shingles on the building are loose or damaged, please secure them to the building with adhesive and/or plastic covering, or remove them intact for later re-applying to the structure. I recommend you spray a mix of soapy water on any shingles you handle to minimize the potential for dust.

Thank you for your attention to this matter. Please call me if you have any questions.

Sincerely,

John Pavitt US EPA R10, Alaska Operations Office (907) 271-3688 For information on asbestos, please see: www.epa.gov/asbestos

Notifications for projects in **Alaska**, **Idaho and on Tribal lands** should be mailed at least 10 working days in advance to:
Asbestos NESHAP Coordinator
US EPA, Region 10 (20-C04)
1200 Sixth Ave., Suite 155
Seattle, WA 98101